

United States District Court
SOUTHERN DISTRICT OF OHIO
EASTERN DISTRICT

RECEIVED

FEB 27 2025

Anthony Wayne Scott
RICHARD H. NAGLE, CLERK OF COURT
 COLUMBUS, OHIO

(Enter above the full name of the plaintiff in this action)

VS

2:25 CV 0188

JUDGE GRAHAM

MAGISTRATE JUDGE SILVAIN

RN HOPKINS Individual capacityRN DUNN Individual capacity"JOHN DOE" Individual capacity

(Enter above the full name of the defendant or defendants in this action)

COMPLAINT**I. Previous Lawsuits.**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No (✓)

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.

1. Parties to this previous lawsuit

Plaintiffs _____

Defendants _____

2. Court (if Federal Court, name the District; if State Court, name the County) _____

3. Docket Number _____

4. Name of Judge to whom case was assigned _____

5. Disposition (for example, Was the case dismissed?
 Was it appealed?
 Is it still pending?)

II. Place of present confinement PICKWAY Correctional Institution

- A. Is there a prisoner grievance procedure in this institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?
Yes ☒ No ☐

C. If your answer is YES,

1. What steps did you take? I filed an informal complaint and an appeal after the informal complaint was denied. These were filed at EMC and Madison Corr. Institution
2. What was the result? Grievance was denied stating "no further action will be taken on this matter."

D. If your answer is NO, explain why not

E. If there is no prison grievance procedure in this institution, did you complain to the prison authorities?
Yes ☐ No ☐

F. If your answer is YES,

1. What steps did you take?
2. What was the result?

III. Parties

In Item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of Plaintiff Anthony Scott #616784
Address Pickway Corr. Inst. 11781 St. Rt. 762 Orient, OH 43146

B. Defendant MS Dunn is employed as RN-Registered Nurse at Chillicothe Corr. Institution

C. Additional Defendants MS Hopkins-Registered Nurse at Chillicothe Corr. Institution
Mr. "John Doe" Don't Know his Position at Chillicothe Corr. Institution

IV. Statement of claim.

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

On Saturday, June 8th, 2024 between 1:30 A.M. - 3:00 A.M. while at Chillicothe Corr. Institution I suffered several seizures repeatedly. After the seizures subsided a nurse and a correction officer, one person under each arm escorted me down two flights of steps to an awaiting golf cart and another nurse. I was instructed to sit on a small seat directly behind the driver. The seat was positioned at the side edge of the golf cart. I was very groggy and no one was back there with me nor was I secured in any way. The nurse made a 90° turn and all I know is I was on the ground in intense pain. The Nurses and "John Doe" was yelling at me, "Get up! You can walk! You probably high or drunk!" "John Doe" then rolled me on my side and pushed all his body weight down on me as if he was trying to push me through the concrete, saying through clenched teeth, "Get up. Ain't nothing wrong with you." I passed out there after.

Continue on next Page - Attachment 1 & 2

I was transported to Adena ER in Chillicothe, OH and still today I have no recollection of being there. Later that day I was transported to OSU Med. where I stayed until June 10TH and was prescribed a cane, a 4 wheel walker and medication, for the deep abrasions to my right arm, right leg, and the back of my head. I was sent back to Chillicothe Corr. Institution June 10TH, 2024 and the medical personell refused me everything OSU Med Prescribed me, including the cane and 4 wheel walker. The Nurses at Chillicothe also measured a Knot on back of my neck 6 cm wide, 6 cm long, and protruding 3.5 c.m. On June 11TH, 2024 I was sent to FMC/C MC where I stayed until June 25TH, 2024. I was diagnosed with seizures and sciatic nerve damage. Once again a cane and a four wheel walker was Prescribed to me. I utilized them for three months.

I am filing this 8TH Amendment violation claim against Ms. Dunn (RN) for:

- 1) Deliberate Indifference to serious medical needs.
- 2) Medical Negligence
- 3) Pain and Suffering
- 4) Future Pain and Suffering
- 5) Cruel and Unusual Punishment
- 6) Emotional Distress

Attachment 1

I am filing this 3rd Amendment violation claim against
Ms. Hopkins (RN) for:

- 1) Deliberate Indifference to serious medical needs
- 2) Medical Negligence
- 3) Pain and Suffering
- 4) Future Pain and Suffering
- 5) Cruel and Unusual Punishment
- 6) Emotional Distress

I am filing this 8th Amendment violation claim against
"John Doe" for:

- 1) Deliberate Indifference to serious medical needs.
- 2) Pain and Suffering
- 3) Cruel and Unusual Punishment
- 4) Medical Negligence
- 5) Emotional Distress

Attachment 2

I, Anthony Scott would like the court to grant the following relief from Ms Dixon (RN) and Ms Hopkins (RN):
\$75,000.00 for Punitive damages and \$3,950.00 compensatory damages for billed medical expenses from Adena ER.

Deliberate Indifference - \$5,000.00

Pain and suffering - \$5,000.00

Future Pain and suffering - \$50,000.00

Cruel and Unusual Punishment - \$5,000.00

Emotional Distress - \$5,000.00

Medical Negligence - \$5,000.00

I would like the court to grant the following relief from "John Doe": \$30,000.00 Punitive damages

Deliberate Indifference - \$5,000.00

Emotional Distress - \$5,000.00

Pain and suffering - \$10,000.00

Cruel and Unusual Punishment - \$10,000.00

Signed this 22nd day of February, 2025.

Anthony Scott
Signature of Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

February 22nd, 2025.
Date

Anthony Scott
Signature of Plaintiff